

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	CRIMINAL No.
v.	)	
	)	
	)	03-CR-10331 (RGS)
IVAN VELEZ	)	
Defendant.	)	

**GOVERNMENT'S SUPPLEMENTAL LIST OF POTENTIAL EXHIBITS**

The United States of America, through its attorneys, Michael J. Sullivan, United States Attorney for the District of Massachusetts and Assistant U.S. Attorneys Cynthia W. Lie and Suzanne Sullivan, hereby files the following Supplemental List of Potential Exhibits for the trial in the above-captioned matter. The government reserves its right to supplement or modify the list with reasonable notice to the defendants:

Exhibit	Description
1	Black Market Exchange Chart
2	Chart of Participants
3	USCL Sovereign Bank Account 30900001923 Account Opening Forms and Records
4	Navarro Sovereign (originally Fleet) Bank Account 3090015598 Account Opening Forms and Records
5A-5C	Deposit Slips into USCL Account 30900001923 Records and Navarro Account

6	Bank Photos of Oscar Patino
7	Sovereign Bank Branch Identifying Records
8	Chart of Cash Deposits of Patino
9	Money Order Deposits into USCL Account 30900001923 and Navarro Account 3090015598
10	Chart of Money Order Deposits into USCL Account 30900001923 and Navarro Account 3090015598
11A	Money Order Closeout Reports
11B	Money Order Closeout Report Section
12	Triboro Checking Branch Locations
13	Third Party Checks Deposited into USCL Account 30900001923
14A	Grande City National Bank Account 140919417 Records
14B	Money Order Deposits from Triboro Checking into Grande City National Bank Account 140919417 Records
15	Gordillo/Grande Washington Mutual Account 389-205591-0 Records
16	Record of Wire Transfer From Grande to USCL Account
17	Opt 4 Citibank Statement 5/7/01 - 6/6/01
18	AIRTRAN Reservation Documents

19	Nextel Bill for May 4-June 3, 2001 for telephone numbers: 781 858 1678 781 858 1679 781 858 1680
20	GES telephone records for 305-639-2729
21	Tape-34: Consensual Recording between Patino and Velez
22	Tape-35: Consensual Recording between Patino and Velez
23	Tape-36: Consensual Recording between Patino and Velez
24	Tape-37: Consensual Recording between Patino and Velez
25	English/Spanish Transcript for Tape 34
26	English/Spanish Transcript for Tape 35
27	English/Spanish Transcript for Tape 36
28	English/Spanish Transcript for Tape 37
29	Email dated May 28, 2001 between Patino and Navarro and Records concerning \$63,446.10 wire transfer from Sovereign Bank USCL Account to Juki Union
30	May 23, 2001 emails between Patino and Navarro Tax Returns for General Express Services
31	May 27, 2001 email between Patino and Navarro
32	Emails between Patino and Velez from March 15, 16, 30, 2004
33	PLEA AGREEMENT FOR CLAUDIA NAVARRO
34	PLEA AGREEMENT OSCAR PATINO
35	PLEA AGREEMENT VARUGHESE VARUGHESE

36	Ivan Velez Bank of America Account 0034 3018 2823 Records
37	General Express Services Bank of America Account 0030 6732 0115 Records
38	Tax Returns for Ivan Velez
39	Tax Returns for General Express Services

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Cynthia W. Lie

CYNTHIA W. LIE  
SUZANNE M. SULLIVAN  
Assistant U.S. Attorneys

Dated: January 30, 2006